

1 PAUL Q. GOYETTE, SB 137250
TAWNI O. PARR, SB 209626
2 GOYETTE & ASSOCIATES, INC.
11344 COLOMA ROAD #145
3 GOLD RIVER, CA 95670
Tel: 916-851-1900
4 Fax: 916-851-1995

5 Attorneys for CHRISTINA RINCON
and GARY DOMINGO
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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT
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11 MARY COOPER, individually and as
guardian ad litem for her minor daughter
12 ALEXANDRIA C.,

13 Plaintiffs,

14 v.

15 COUNTY OF NAPA; NAPA COUNTY
SHERIFF'S DEPARTMENT; CITY OF
16 NAPA POLICE; CITY OF NAPA
OFFICERS GARY DOMINGO,
17 CHRISTINA RINCON; NAPA SHERIFF'S
DEPUTY MOSLEY; and DOES 1-50,
18 INCLUSIVE,

19 Defendants.
20 _____ /

21 AND RELATED COUNTERCLAIM.
_____ /

CASE NO. 04-04095 MHP

**STIPULATED REQUEST FOR
CONTINUANCE OF EARLY
NEUTRAL EVALUATION
(Civil L.R. 6-2)**

22 The parties hereby stipulate and request a continuance for the completion of Early
23 Neutral Evaluation ("ENE") from June 13, 2005 to a later date as the court deems appropriate.
24 The parties have met and conferred with each other and the designated evaluator in an attempt to
25 schedule the ENE. However, due to scheduling conflicts such as a lengthy trial in which
26 Plaintiff's counsel has been engaged and conflicts with the designated evaluator's schedule, the
27 parties have been unable to schedule a date for the ENE prior to June 13, 2005. The parties
28 anticipate completing ENE with the designated evaluator on or before July 30, 2005.

1 In light of the foregoing, the parties respectfully request the Court find good cause exists
2 to continue the ENE and fix another deadline for its completion.

3 Dated: June 9, 2005

/s/Matthew C. Bishop
Matthew C. Bishop
Attorney for Plaintiff

5 Dated: June 8, 2005

LEPPER & HARRINGTON

6 By: /s/Wakako Uritani
7 Wakako Uritani
8 Attorney for Defendant
9 County of Napa
Napa County Sheriff's Department
Deputy Aaron Mosley

10 Dated: June 8, 2005

11 /s/ David Jones
David Jones
12 Attorney for Defendant
City of Napa

13 Dated: June 8, 2005

GOYETTE & ASSOCIATES, INC.

14 By: /s/ Paul Q. Goyette
15 Paul Q. Goyette
16 Attorney for Defendants
Gary Domingo and Christina Rincon

17 *ENE to be completed*
on or before 7/30/05.
6/22/05
18 **IT IS SO ORDERED**
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U.S. DISTRICT JUDGE